

Bruce Hudson
Plaintiff

VS

Defendants

City of Columbia Police Dept.
Chief Police W.H.S. Holbrook
Officer Latisha S. Pitts
Investigator Lighthill
Investigator Tronier
Chief of SLED: Mark Keel
Attorney Gen. Alan Wilson
A.P.S. "D.S.S." Joan Meacham
Ombudsman Office Amy Hornsby
L.L.R. Investigator: Mark Sanders
Lt. Governor Dept. of Aging: Kevin Bryant
Head Public Defender Douglas Strickland
Public Defender Sarah Jarick
Head Solicitor April Sampson
Clerk of Court Jeanett McBride.

CASE NO:

Complaint for
violation of
CIVIL RIGHTS,
A.O.A and
S.C Adult
Protection
Act

Jury Trial:

☒ Yes ☐ NO

This complaint is filed by friends of the plaintiff, on behalf of the plaintiff, about issues that happened before plaintiff was under arrest or a inmate in S.C.D.C

A preliminary injunction motion was filed requesting a court order criminal investigation into Allegation because 100s if not 1,000s of patients are a Risk

This case is deeply associated with. case No. 3:18-cv-03188-TMC-TERR

Note: All Allegations are supported by evidence already presented in case No. 3:18-cv-03188-TMC-TERR

We have sued separately because issues are different but related. Here is my complaint against the defendants listed.

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The city of Columbia police Dept. is being sued because multiple law enforcement agents violated, S.C Adult Protection Act, Americans with disabilities Act, My 1st Amendment Right, 5th Amendment Right, 8th Amendment Right, and 14th Amendment Right all the above Acts or Rights was violated with disability based discrimination, both named and unnamed/unknown officers violated my rights From Feb - June 2017. Some officers refused to investigate while others tried to cover up felony crimes done against me a vulnerable Adult.

The Chief of Police W.H. Skip Holbrook is being sued because he is over city of Columbia police Dept and its officers, that failed to protect me, despite multiple 911 calls, multiple complaints, and physical evidence of neglect and abuse, and failed to investigate or Document any of the abuse.

For almost 4 months the police Dept was aware of caregivers neglect abuse and assault, yet failed to enforce laws of S.C. Adult Protection Act and failed to protect the plaintiff there for allowing care givers to continue to abuse the plaintiff. worst

each time the plaintiff tried to report abuse and police failed to act accordance to the law the plaintiff suffered more extreme abuse. one time after calling 911 to report neglect the plaintiff was neglected, abuse, threaten and punished for about a month.

Worst after neglect, abuse and assaulted ended, plaintiff continued to seek justice with city of columbia police Dept. Evidence was forwarded including video footage of plaintiff being attacked while in bed, eyewitness statements, text messages from Nurse Admitting abuse & Assault. and medical records showing neglect and assault yet nothing was done.

When S.C.D.C. started a investigation the city of columbia police Dept. made false Allegations in order to stop investigators from investigating into this matter, this was done to cover up the crimes.

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I have evidence the city of Columbia Police Dept. and its officers knew

1) my caregivers did commit crimes of neglect, abuse and assault against me a vulnerable human to enforce disciplinary actions which violated my 8th and 14th Amendment Rights while also violating every section of 43-35-1 of S.C. Adult Protection Act and Americans with Disabilities Act.

2) The Disciplinary Actions enforced by neglect, abuse and ~~assault~~ were ~~done~~ with disability based discrimination, because disciplinary actions was used to correct both hereditary mental health issues and my recovery mental health issues that developed from being a victim of violent crimes and left me with P.T.S.D.! Such disciplinary actions was enforced despite the fact that

- 1) Disciplinary actions didn't correct issues
- 2) Disciplinary actions made issues worse
- 3) I was unable to do what they wanted because of disabilities, no matter how excessive disciplinary actions was

this violated Section 43-3510-(8) which states that abuse is using physically intrusive procedures to control

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behavior for the purpose of punishments

3) The Type of disciplinary actions taken placed restrictions on my 1st Amendment Rights including freedom to associate because they refused to allow me visitors as a punishment and freedom of speech because they restricted/banned the use of a phone as a punishment and freedom of press because they refused to allow me to send or get mail, watch TV or go on websites, media social Networks etc.

4) Disciplinary Actions placed restriction of my 5th Amendment right by violating due process

1) I was never charged with any wrong doing but was punished for months

2) I never got a court hearing or fair trial on what I was punished for

3) there was no grievance or appeal process I could use to correct or complain

4) No lawyer or judge involvement

5) All punishments were extreme and excessive lasting for months

6) punishments made me a prisoner and isolated me with

In the hospital, worst army protest against punishment was called a disturbance and was quickly put down with force! Neglect, Abuse, threats of intimidation and assault was all used with Isolation, Restrictions and confinement of my room,

NONE of this however could have been done without law enforcements refusal to enforce S.C. Adult protection Act and failure to protect a disable patient.

43-35-10-(8) states
"abuse is failing to act or protect a vulnerable human from neglect, abuse or assault"

There for every officer should be charged with abuse on a disable vulnerable human that caused extreme mental and physical injury on the plaintiff and violated many of his human and citizen rights

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Columbia Police Dept officer Latisha S. Pitts is being sued because on June 11 2017 she responded to a 911 call of disturbance and found a vulnerable bedridden human on the floor bleeding, bruised, crying, Irs snatched out of his arm as her body CAM should have recorded. I the vulnerable Adult reported neglect abuse and assault but was ignored.

1) she refused to protect me or place me in protective custody as I requested, she refused to investigate any allegations made by me and instead side with the abusers, refused me the right to file a complaint or police report

2) she failed to take pictures or report incident to SLED as Section 43-35-30 "Photographing of visible trauma" orders her to do

3) she made attempts to cover up crimes by instead charging a bedridden vulnerable human with assault, note this trumped up charge was thrown out of court by a judge.

I've requested internal affairs

of columbia police dept and the inspector general to investigate her misconduct. worst of all she left me there were abuse and assault could continue.

Note: many 911 calls was done and multiple law enforcers failed to protect me, many I never got there names.

Investigator light Hill, was contacted by columbia police service for S.C.D.C investigating there own officers misconduct.

MR. lighthill gave false info to the investigating officer, that made them stop investigations.

This was done to cover up crimes. I have evidence that he lied and got the investigation stopped, for this reasons hes being sued.

Investigator Frantner: was contacted by multiple eye witnesses that mailed medical records, video footage, and other evidence but he refused to press charging stating its to late.

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The Attorney General "Alan Wilson"
Chief of SLED "Mark Keel" ombudsman
office Director "Amy Hornsby" LLR "Mark Sanders"
LT Governor office of Aging "Kevin Bryant"
D.S.S Director Adult Protective Services:

^{Joan Meacham}
all 6 are being sued and there offices
because they are listed as investigative
Entites in S.C. Adult Protection Act
43-35-10 (s) and all failed to enforce
laws, investigate Allegation / complaint and
refused to protect a vulnerable human
43-35-5 lists All duties and procedures
43-35-40 lists powers of each Entite

I have evidence each org.
was told of the neglect, abuse
and assault but failed to
investigate.

Also The clerk of court: Jeanett McBride
the Head solicitor: April Sampson
the Head Public Defender: Douglas Strickland
and Public Defender Sarah Jarrett

All 4 of Richland General sessions
court is being sued for failing
to Report crimes of abuse on
a vulnerable Adult and failing
to investigate the matter, then
failed in there duty to protect the people

This complaint was file by friends of the plaintiff and mailed off by hospice inmates that have worked with plaintiff family / friends

Beccomes of plaintiff disabilities hes unable to do his own legal work as exhibits will prove

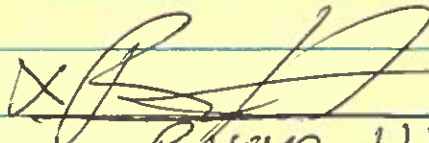
Againt his case is associated to 3:18cv03188 TMC JER

I hereby sign
swearing under penalty of
perjury the above complaint
is true

X O

Bruce Hudson

2-14-2019

X 

Ryan Hill

2-1-19

X 

Lisa Neer

2-1-19

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

ADA, 1st Amendment, 5th Amendment
8th Amendment, 14th Amendment, Disability
based discrimination, S.C. Adult Protection Act

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Each defendant is apart of a investigative
or enforcement Entity, I contacted and
reported to each defendant in there official
capacity see Attached complaint

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
☐ Civilly committed detainee
☐ Immigration detainee

- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☒ Other (explain) At time of offense I
was a free citizen

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

see Attached complaint
at the hospital

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

see Attached complaint

- C. What date and approximate time did the events giving rise to your claim(s) occur?

see Attached complaint

- D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

see Attached complaint

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

see Attached complaint

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I'm requesting \$100,000 per each defendant plus a extra \$1 million per each government org. both actual and punitive damages

Total: 15 Defendants = 1.5 million and total of 10 investigative entities = 10 million dollars grand total of \$11,500,000

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☐ Yes

☒ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

N-A I was not a
inmate at the
time

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☐ Yes

☐ No

☐ Do not know

N-A

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

N-A I was not
a inmate
at the time

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☒ No

No need
I was not
a inmate

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

E. If you did file a grievance:

1. Where did you file the grievance?

NA

2. What did you claim in your grievance?

NA

3. What was the result, if any?

NA

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

NA

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

N/A

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☒ Yes

☐ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

Bruce Hawson

Defendant(s)

Palmetto Richman Hospital

2. Court (if federal court, name the district; if state court, name the county and State)

Federal court/United States District
of S.C. Richmond

3. Docket or index number

3:18-CV-03188 TMC-TERR

4. Name of Judge assigned to your case

unknown

5. Approximate date of filing lawsuit

unknown

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition.

N/A

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

N/A

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2-14, 2019

Signature of Plaintiff _____

Printed Name of Plaintiff Bruce Hudson

Prison Identification # 299312

Prison Address 990 WISELEY HWY

Bishopville

SC

29010

City

State

Zip Code

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____